

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Columbia Gas Transmission, LLC
15971 Botetourt Road in Botetourt County, Virginia
Permit No. (BRRO-20157)

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40CFR Part 70 and 9VAC5 Chapter 80, Columbia Gas Transmission, LLC has applied for a Title V Operating Permit for its Gala Compressor Station facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Contact: _____ Date: _____
Lillian J. Alexander
(540) 562-6783

Air Permit Manager: _____ Date: _____
David J. Brown

Regional Director: _____ Date: _____
Robert J. Weld

FACILITY INFORMATION

Permittee

Columbia Gas Transmission, LLC
P.O. Box 1273
Charleston, WV 25325-1273

Facility

Columbia Gas Transmission Corporation – Gala Compressor Station
15971 Botetourt Road
Eagle Rock, Virginia 24085

County-Plant Identification Number: 51- 023-0009

SOURCE DESCRIPTION

NAICS Code: 486210 – Pipeline Transport of Natural Gas

Natural gas is received via gas pipelines from an upstream compressor station and is compressed using three natural gas fired reciprocating engines. The gas is then pumped into outlet pipelines for transmission to a downstream station. The facility has the potential to emit (PTE) approximately 110 tons per year of carbon monoxide, and is therefore considered a major Title V source. PTE of all other criteria pollutants are less than 100 tons per year each. PTE for HAPs is less than 10/25 tons per year making the facility an area source for HAPs.

The two White-Superior 8GTLA engines (01203 and 01204) each rated at 1,100 hp, were initially permitted on May 2, 1983. The engines are fueled by pipeline quality natural gas. The permit was amended on July 13, 2009 and again on March 7, 2011 to remove the state-only section upon promulgation of existing area source provisions of the RICE MACT, Subpart ZZZZ (Reciprocating Internal Combustion Engines).

The Superior 16SGTB engine (01205) rated at 2,650 hp was originally permitted on March 18, 1997. The permit was modified on March 11, 1999 and again on July 2, 2001 to increase the formaldehyde emission limit. Annual fuel usage is limited to 212 MMscf of natural gas. The 1999 permit was amended on July 2, 2001 to create a state-only section for toxics. By request from the permittee, this state-only section was removed by a minor amendment on May 23, 2011 for the same reason stated above for units 0123 and 0124.

The Waukesha auxiliary generator (012G1) rated at 221 hp was initially permitted on Sept. 23, 1993. Limitations include 1,000 hours or less of operation and 1.695 MMscf or less of pipeline quality natural gas throughput per year.

The Waukesha air compressor (012A1) was previously considered an insignificant emissions unit but since it is subject to requirements under the RICE MACT, it will now be included in the Title V permit.

The five units referenced above (03, 04, 05, G1 and A1) have emission and/or work practice standards applicable under the area source RICE MACT (Subpart ZZZZ). This facility is not considered a remote location under this rule.

The facility is a Title V major source of CO. This source is located in an attainment area for all pollutants however Botetourt County is an emissions control area for NO_x and VOC (see 9VAC5-20-206). There are no applicable requirements for this facility associated with being located within an emissions control area.

The facility has three current state NSR permits to construct and operate as follows:

1. April 22, 1983 as amended July 13, 2009 and March 7, 2011
two White-Superior Reciprocating Engines/Compressors (01203 and 01204)
2. March 18, 1997 as amended March 11, 1999, July 2, 2001 and May 23, 2011
one Superior Reciprocating Engine/Compressor (01205)
3. September 23, 1993
one Waukesha Reciprocating Engine/Generator (Auxiliary) (012G1)

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment						
01203	E03	White-Superior 8GTLA Reciprocating Engine/Compressor; Spark Ignition 4-cycle, clean burn; installed 1983	1,100 HP	none	N/A	March 7, 2011
01204	E04	White-Superior 8GTLA Reciprocating Engine/Compressor; Spark Ignition 4-cycle, clean burn; installed 1983	1,100 HP	none	N/A	March 7, 2011
01205	E05	Superior 16SGTB Reciprocating Engine/ Compressor; Spark Ignition 4-cycle, clean burn; installed 1997	2,650 HP	none	N/A	May 23, 2011
012G1	G1	Waukesha VSG 11GSI Reciprocating Engine/(Emergency) Generator; 4-cycle, rich burn; installed 1992	221 HP	none	N/A	Sept. 23, 1993
021A1	A1	Waukesha VRG232U 4 stroke rich burn air compressor; installed 1977	25 HP	none	N/A	--

EMISSIONS INVENTORY

Emissions from the 2012 emission update are summarized in the following tables.

2012 Actual Emissions

	2012 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	17.47	44.26	0.08	0.01	37.50

2012 Facility Hazardous Air Pollutant Emissions

Pollutant	2012 Hazardous Air Pollutant Emission in Tons/Yr
Formaldehyde	3.79

APPLICABLE REQUIREMENTS – (Emission Units 01203 and 01204)

Underlying permit requirements (Emission Units 01203 and 01204)

The following limitations are carried forward from the March 7, 2011 minor NSR permit:

Condition 2 - NO_x and VOC emissions shall be controlled by low-emission combustion using Clean-Burn technology (lean ratio engines equipped with pre-combustion chambers and automatic controls for fuel/air mixture, ignition timing and intake manifold temperature).

Condition 3 – The facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods

Condition 4 - The approved fuel is natural gas.

Condition 5 - Emissions shall not exceed the following limits:

Nitrogen Oxides (as NO ₂)	4.4 lbs/hr	19.1 tons/yr
Volatile Organic Compounds	3.7 lbs/hr	15.9 tons/yr
Carbon Monoxide	7.3 lbs/hr	31.8 tons/yr

Condition 6 - Visible Emissions shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emission shall not exceed 30 percent opacity.

Condition 7 – the permittee is required to maintain records of the following:

- the natural gas throughput for each engine, calculated monthly as the sum of each consecutive 12-month period
- Scheduled and unscheduled maintenance and operator training.
- Results of all stack tests, visible emission evaluations and performance evaluations.

Condition 11 – At all times, including periods of start-up, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance;
- b. Maintain an inventory of spare parts;
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum; and
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.

Streamlined Requirements (Emission Units 01203 and 01204)

The following conditions from the March 7, 2011 NSR have been streamlined out of the Title V permit:

Conditions 8 and 12 – malfunction notifications and records as required under 9VAC5-20-180 are included in the General Conditions of the Title V permit.

Condition 10 – right of entry requirements are included in the General Conditions of the Title V permit

Additional Streamlining (9VAC Chapter 50)

Visible Emissions shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity (9VAC5-50-80) – Condition 6 of the 3/7/11 permit incorporates an opacity limitation requirement

Additional Requirements (Emission Units 01203 and 01204)

The permittee is required to make a visible emission evaluation of each unit once per week. If emissions are observed, the permittee is required to either take corrective action or conduct an EPA Method 9. The permittee will maintain an observation log.

Requirements of RICE MACT (ZZZZ) for Area Sources (Emission Units 01203 and 01204)

The two White-Superior 8GTLA engines are subject to the following area source requirements of the RICE MACT (40CFR63 Subpart ZZZZ):

Emission Limitation requirements of §63.6603(a) and Table 2d, Section 9

General Requirements of §63.6605(a) and (b)

Initial Performance Testing requirements of §63.6612

Performance Testing requirements of §63.6620 and Table 4, Section 1 or 3

Monitoring, installation, collection, operation and maintenance requirements of §63.6625(b) and (h)

Initial compliance demonstration requirements of §63.6630 and Table 5, Section 13

Monitoring and data collection to demonstrate continuous compliance of §63.6635

Continuous compliance requirements of §63.6640 and Table 6, Section 14

Notification requirements of §63.6645

Reporting requirements of §63.6650 and Table 7, Section 3

Recordkeeping requirements of §63.6655 and §63.6660

Applicable General Provisions of §63.6665 and Table 8

Compliance (Emission Units 01203 and 01204)

Columbia Gas wrote to EPA asking for a one year extension to the MACT compliance date for these engines. EPA granted the extension in accordance with 40CFR §63.6(i)(4)(i)(A). A copy of this letter is attached to the SOB. The approved RICE MACT compliance date for these units is October 19, 2014.

The maintenance, training, observation and monitoring required for these engines in conjunction with required recordkeeping are considered sufficient monitoring to ensure compliance with the emission limits included for Units 01203 and 01204.

EMISSION UNIT APPLICABLE REQUIREMENTS – (Emission Unit 01205)

Underlying permit requirements (Emission Unit 01205)

The following limitations are carried forward from the May 23, 2011 minor NSR permit:

Condition 4 - Nitrogen oxide and volatile organic compound emissions shall be controlled by low-emissions combustion using Clean-Burn technology.

Condition 5 - The approved fuel is natural gas.

Condition 7 - Annual fuel throughput limited to 212 MMscf of natural gas.

Condition 10 - Emissions shall not exceed the following limits:

Particulate Matter	0.8 lbs/hr	3.1 tons/yr
PM-10	0.8 lbs/hr	3.1 tons/yr
Nitrogen Oxides (as NO ₂)	10.1 lbs/hr	38.4 tons/yr
Carbon Monoxide	10.8 lbs/hr	40.9 tons/yr
Volatile Organic Compounds	4.0 lbs/hr	15.4 tons/yr

Condition 11 - Visible Emissions shall not exceed 5 percent opacity except for one six-minute period in any one hour of not more than 10 percent opacity.

Condition 13 - Maintain records of the annual throughput of natural gas

Condition 18 – The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training.

Streamlined Requirements (Emission Unit 01205)

The following conditions from the May 23, 2011 NSR have been streamlined out of the Title V permit:

Conditions 8, 9, 12 and 19 – these conditions are marked as “completed” in the minor NSR

Condition 3 – the Clark engines have been removed

Condition 15 – site accessibility for inspections is included in the Title V general conditions

Conditions 16 and 17 – Failure and malfunction are included in the Title V general conditions

Condition 21 – requirements for maintaining source emission data is included in the Title V general conditions

Additional Streamlining (9VAC Chapter 50)

Visible Emissions shall not exceed 5 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 10 percent opacity – Condition 11 of the 5/23/11 permit incorporates a more stringent opacity limitation than 9VAC5-50-80

Additional Requirements (Emission Unit 01205)

The permittee is required to make a visible emission evaluation of this unit once per week. If emissions are observed, the permittee is required to either take corrective action or conduct an EPA Method 9. The permittee will maintain an observation log.

Requirements of RICE MACT (ZZZZ) for Area Sources (Emission Unit 01205)

The Superior 16SGTB engine is subject to the following area source requirements of the RICE MACT (40CFR63 Subpart ZZZZ):

Emission Limitation requirements of §63.6603(a) and Table 2d, Section 9.

General Requirements of §63.6605(a) and (b)

Initial Performance Testing requirements of §63.6612.

Performance Testing requirements of §63.6620 and Table 4, Section 1 or 3.

Monitoring, installation, collection, operation and maintenance requirements of §63.6625(b) and (h).

Initial compliance demonstration requirements of §63.6630 and Table 5, Section 13

Monitoring and data collection to demonstrate continuous compliance of §63.6635

Continuous compliance requirements of §63.6640 and Table 6, Section 14

Notification requirements of §63.6645

Reporting requirements of §63.6650 and Table 7, Section 3

Recordkeeping requirements of §63.6655 and §63.6660

Applicable General Provisions of §63.6665 and Table 8

Compliance (Emission Unit 01205)

Columbia Gas wrote to EPA asking for a one year extension to the MACT compliance date for this engine. EPA granted the extension in accordance with 40 CFR §63.6(i)(4)(i)(A). A copy of this letter is attached to the SOB. The approved RICE MACT compliance date for this unit is October 19, 2014.

The maintenance, training, observation and monitoring required for these engines in conjunction with required recordkeeping are considered sufficient monitoring to ensure compliance with the emission limits included for Unit 01205.

EMISSION UNIT APPLICABLE REQUIREMENTS – (Emission Unit 012G1)

Limitations (Emission Unit 012G1)

The following limitations are carried forward from the September 23, 1993 minor NSR permit:

Condition 4 - The approved mode of operation is normal (best economy).

Condition 3 - The approved fuel is natural gas.

Condition 6 - The generator shall not operate more than 1,000 hours per year.

Condition 5 - The generator shall consume no more than 1.695MMscf of natural gas per year.

Condition 8 - Emissions shall not exceed the following limits:

Nitrogen Oxides (as NO ₂)	6.9 lbs/MMBtu	14.0 lbs/hr	7.0 tons/yr
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Condition 7 - Visible Emissions shall not exceed 5 percent opacity.

Condition 9 - Maintain records of the number of hours of operation and the annual throughput of natural gas (in million cubic feet)

Streamlined Requirements (Emission Unit 012G1)

Condition 11 – site accessibility for inspections is included in the Title V general conditions

Conditions 12 and 13 – Failure, malfunction and maintenance are included in the Title V general conditions

Condition 15 – requirements for maintaining source emission data is included in the Title V general conditions

Additional Streamlining (9VAC Chapter 50)

Visible Emissions shall not exceed 5 percent opacity as determined by EPA Method 9 – Condition 7 of the 9/23/93 permit incorporates a more stringent opacity limitation than 9VAC5-50-80

Additional Requirements (Emission Unit 012G1)

The permittee is required to make a visible emission evaluation at least once per week when the auxiliary generator is operating. If emissions are observed, the permittee is required to either take corrective action or conduct an EPA Method 9. The permittee will maintain an observation log.

Requirements of RICE MACT (ZZZZ) for Area Sources (Emission Unit 012G1)

The permittee intends to operate the Waukesha auxiliary generator as an emergency stationary RICE as defined in 40CFR §63.6675. This generator is subject to the following area source requirements of the RICE MACT (40CFR63 Subpart ZZZZ):

Emission Limitation requirements of §63.6603(a) and Table 2d, Section 5

General Requirements of §63.6605(a) and (b)

Monitoring, installation, collection, operation and maintenance requirements of §63.6625(e)(3), (f), (h) and (j)

Continuous compliance requirements of §63.6640 and Table 6, Section 9

Recordkeeping requirements of §63.6655 and §63.6660

Applicable General Provisions of §63.6665 and Table 8

Compliance (Emission Unit 012G1)

The RICE MACT compliance date for this unit is October 19, 2013.

The maintenance, training, observation and monitoring required for these engines in conjunction with required recordkeeping are considered sufficient monitoring to ensure compliance with the emission limits included for Unit 012G1.

EMISSION UNIT APPLICABLE REQUIREMENTS – (Emission Unit 012A1)

Limitations (Emission Unit 012A1)

This unit has no underlying State-issued permit. The following requirement is from 9VAC, Chapter 50

Visible Emissions shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity (9VAC5-50-80)

Additional Requirements (Emission Unit 012A1)

The permittee is required to make a visible emission evaluation at least once per week. If emissions are observed, the permittee is required to either take corrective action or conduct an EPA Method 9. The permittee will maintain an observation log.

Requirements of RICE MACT (ZZZZ) for Area Sources (Emission Unit 012A1)

This unit is subject to the following area source requirements of the RICE MACT (40CFR63 Subpart ZZZZ):

Emission Limitation requirements of §63.6603(a) and Table 2d, Section 10

General Requirements of §63.6605(a) and (b)

Monitoring, installation, collection, operation and maintenance requirements of §63.6625(e)(8), (h) and (j)

Continuous compliance requirements of §63.6640 and Table 6, Section 9

Recordkeeping requirements of §63.6655 and §63.6660

Applicable General Provisions of §63.6665 and Table 8

Compliance (Emission Unit 012A1)

The RICE MACT compliance date for this unit is October 19, 2013.

The maintenance, training, observation and monitoring required for these engines in conjunction with required recordkeeping are considered sufficient monitoring to ensure compliance with the emission limits included for Unit 012A1.

CAM PROVISIONS

This facility has no equipment or processes subject to CAM.

MACT REQUIREMENTS

Area source MACT requirements for Subpart ZZZZ (RICE MACT) are included in the Emission Unit Applicable Requirements sections above.

GENERAL CONDITIONS

The permit contains general conditions required by 40CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring

reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-2003”.

This general condition cites the Articles that follow:

Article 1 (9VAC5-80-50 et seq.), Part II of 9VAC5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9VAC5-80-80. Application

9VAC5-80-140. Permit Shield

9VAC5-80-150. Action on Permit Applications

F. Failure/Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. Section 9VAC5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9VAC5-20-180 and 9VAC5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:

9VAC5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9VAC5-80-190. Changes to Permits.

9VAC5-80-260. Enforcement.

9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9VAC5-80-1605. Applicability, Permits for Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9VAC5-80-250 and 9VAC5-20-180. The malfunction requirements are listed in the General Conditions.

This general condition cites the sections that follow:

9VAC5-20-180. Facility and Control Equipment Maintenance or Malfunction

9VAC5-80-110. Permit Content

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40CFR61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40CFR61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40CFR61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40CFR61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9VAC5-60-70. Designated Emissions Standards

9VAC5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

Virginia Administrative Codes 9VAC5-50-310 (Odorous Emissions) and 9VAC5-50-320 (Toxic Pollutants) have specific requirements only enforceable by the State but have not been identified as applicable by the applicant.

FUTURE APPLICABLE REQUIREMENTS

This facility is an area source for HAPs. MACT requirements under Subpart ZZZZ for Reciprocating Internal Combustion Engines (RICE) for existing area sources promulgated on August 20, 2010, effective October 19, 2010. Requirements from the RICE MACT apply to units 01203, 01204, 01205, 012G1 and 012A1.

INAPPLICABLE REQUIREMENTS

NSPS JJJJ - the engines at this facility pre-date this NSPS

NSPS IIII – not applicable to spark ignition engines

MACT 6J (area source boiler MACT) – per §63.1195(e) the rule does not apply to gas-fired boilers

The applicant did not identify any inapplicable requirements (Optional Page 3 of Form 805).

There are no applicable GHG permitting requirements.

COMPLIANCE PLAN

Not applicable

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹	Pollutant(s) Emitted	Rated Capacity
BLR3	AJAX n. gas space heating boiler; installed 1998	9VAC5-80-720 C	NOx, CO, VOC, PM10	0.85 MMBtu/hr
HTR3	Modine PD300 direct-fired space heater; installed 2005	9VAC5-80-720 C	NOx, CO, VOC, PM10	0.3 MMBtu/hr
HTR1	HANOVER indirect-fired heater; installed 1998	9VAC5-80-720 C	NOx, CO, VOC, SO2, PM10	2.0 MMBtu./hr
HTR2	GAS TECH indirect-fired heater; installed 1998	9VAC5-80-720 C	NOx, CO, VOC, SO2, PM10	0.45 MMBtu/hr
A06	lube oil AST; installed 1940	9VAC5-80-720 B	VOC	120 gallons
A10	used oil AST; installed 1998	9VAC5-80-720 B	VOC	550 gallons
A11	pipeline liquids AST; installed 1998	9VAC5-80-720 B	VOC	1,000 gallons
A12	used coolant (ethylene glycol) AST; installed 1998	9VAC5-80-720 B	VOC	1,200 gallons
A14	Coolant (ethylene glycol) AST; installed 1998	9VAC5-80-720 B	VOC	1,200 gallons
A15	lube oil AST; installed 1998	9VAC5-80-720 B	VOC	550 gallons
FUG	fugitive emissions (equipment leaks and blowdowns)	9VAC5-80-720 B	VOC	n/a

¹The citation criteria for insignificant activities are as follows:

9VAC5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9VAC5-80-720 B - Insignificant due to emission levels

9VAC5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The draft permit was placed on public notice in *The Roanoke Times* from June 28, 2013 to July 29, 2013. One comment was received during this time, however the comment did not identify any errors or deficiencies in the draft permit as compared to regulatory obligations for Title V, therefore DEQ did not make any changes in response to the comment. A copy of the draft permit and statement of basis was sent to EPA on June 25, 2013. On August 1, 2013 EPA responded that they would not be providing comments on the draft. On August 5, 2013 EPA concurred with DEQ's stance on the public comment received.

Attachment

Letter from EPA granting compliance date extension until October 19, 2014 for Engines 03, 04 and 05